

and 11 are in independent form. It is submitted that no new matter has been added and no new issues have been raised by the present Request.

Applicant affirms the election of Group I, claims 1-5, 11, and 12, with traverse for examination. The requirement is traversed on the ground that it is believed that all of the claims are sufficiently related to be examined in one patent application.

Claims 1-5, 11, and 12 have been rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,085,188 to Bachmann et al. Applicant has carefully considered the Examiner's comments and the cited art, and respectfully submits that independent claims 1 and 11 are patentably distinct from the cited art for at least the following reasons.

Independent claim 1 relates to a method for improving the operational performance of a database system. The method comprises determining whether an instruction or operation adds information or removes information from the database system. For an add operation, the information is first added to an 'out' table. For a remove operation, the information is first removed from an 'in' table.

Bachmann et al., as understood by Applicant, relates to a method of hierarchical LDAP searching in an LDAP directory service having a relational database management system (DBMS) as a backing store. Entries in a naming hierarchy are mapped into first and second relational tables: a parent table and a descendant table. These tables are used to filter lists of entries returned from a search to ensure that only entries within a given search scope are retained for evaluation.

The Office Action cites the ldap\_delete and ldap\_add routines of Bachmann et al.

(see Bachmann et al., col. 6, lns. 47-59; Fig. 7) as allegedly disclosing determining whether an instruction or operation adds information or removes information from the database system, wherein for an add operation, the information is first added to an 'out' table, and wherein for a remove operation, the information is first removed from an 'in' table (see Office Action, p. 4, lns. 10-16). The Office Action also states that the parent table of Bachmann et al. corresponds to an 'out' table, and that the descendant table of Bachmann et al. corresponds to an 'in' table (see id.). Applicant respectfully disagrees.

As understood by Applicant, Bachmann et al. discloses mapping entries in a naming hierarchy having a plurality of entries each represented by a unique identifier (EID) into parent and descendent relational tables (see Bachmann et al., col. 2, lns. 30-35). The tables are used to filter lists of entries returned from a search to ensure that only entries within a given search scope are retained for evaluation (see id., lns. 59-65). For example, the parent table is used during a LDAP one level search, and the descendent table is used during a LDAP subtree search. Use of the parent or descendent table obviates recursive queries through the naming directory (see id.).

Fig. 5 of Bachmann et al. illustrates the LDAP naming hierarchy including a number of entries or nodes, with each entry or node represented by an EID (see id., col. 5, lns. 12-14). Figs. 6A-6B of Bachmann et al. illustrate the mapping of the LDAP directory service naming hierarchy into preferably a pair of relational tables (see id., col. 4, ln. 65 to col. 5, ln. 9).

In the parent table, the EID field is the unique identifier of an entry in the LDAP naming hierarchy, and the PEID field is the unique identifier of the parent entry in the naming hierarchy (see id., col. 5, lns. 51-59). In the descendent table, the AEID field is

the unique identifier of an ancestor LDAP entry in the LDAP naming hierarchy, and the DEID field is the unique identifier of the descendent LDAP entry (see id.).

It is therefore respectfully submitted that, as understood by Applicant, the parent and descendent tables of Bachmann et al. do not function as or correspond to 'in' and 'out' tables, respectively. It is further submitted that Bachmann et al. does not disclose or suggest a method for improving the operational performance of a database system, the method comprising: determining whether an instruction or operation adds information or removes information from the database system, wherein for an add operation, the information is first added to an 'out' table, and wherein for a remove operation, the information is first removed from an 'in' table, as recited in independent claim 1.

Accordingly, Applicant submits that independent claim 1 is patentably distinct over the cited art. Independent claim 11 is believed to be patentable over the cited art for at least similar reasons.

The Office is hereby authorized to charge any additional fees that may be required in connection with this response and to credit any overpayment to our Deposit Account No. 03-3125.

If a petition for an extension of time is required to make this response timely, this paper should be considered to be such a petition, and the Commissioner is authorized to charge the requisite fees to our Deposit Account No. 03-3125.

If a telephone interview could advance the prosecution of this application, the Examiner is respectfully requested to call the undersigned attorney.

Entry of this response and allowance of this application are respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard F. Jaworski", written over a horizontal line.

RICHARD F. JAWORSKI

Reg. No. 33,515

Attorney for Applicant

Cooper & Dunham LLP

Tel.: (212) 278-0400